



BAILEY, BAILEY & WHITE, PLLC
ATTORNEYS AT LAW



JANIKA N. WHITE



August 11, 2021

Christopher Cotten
Assistant U.S. Attorney
167 N. Main St., Ste 800
Memphis, TN 38103

RE: United States of America v. Katrina Robinson
Case No: 20-CR-20148-SHL-tmp

Dear Mr. Cotten:

Pursuant to Fed. R. Crim. P. 16(a)(1)(G) and Local Rules, Katrina Robinson discloses the following expert witnesses for trial:

Ms. Robinson may introduce testimony from Ericka Hayes, a witness with specialized knowledge and experience in Accounting. Ms. Hayes is a Certified Public Accountant and Small Business Consultant. Attached is her Curriculum Vitae which details her qualifications and background.

Ms. Hayes may present testimony on accounting terminology, principles, procedures, methods, practices, corporate governance. As a part of her testimony, Ms. Hayes may use or refer to any document produced or offered as an exhibit. She may also testify to additional opinions in rebuttal to opinion testimony presented by the Government.

Ms. Robinson may also introduce testimony from Chasity Grice, Attorney at Law, who is familiar with the business structure and formation of the Tennessee Healthcare Institute. Attorney Grice has a law degree with a concentration in transactional tax. She has practiced law for fourteen years and provided legal services in the states of Texas and Tennessee in the areas of business formation and taxation.

Attorney Grice may provide testimony regarding corporate structure, corporate governance, legal liability, business practices, and taxation. As a part of her testimony, Attorney Grice may

August 12, 2021
Robinson Page 2

use or refer to any document produced or offered as an exhibit. She may also testify to additional opinions in rebuttal to opinion testimony presented by the Government.

Very truly yours,

BAILEY, BAILEY & WHITE, PLLC

s/Janika N. White

cc: Katrina Robinson